Georgia-Pacific Consumer Products LP

Wauna Mill
92326 Taylorville Rd.
Clatskanie, OR 97016
(503) 298-2600
(503) 455-3926 fax
www.gp.com

March 1, 2016

Mr. George F. Davis
Oregon Department of Environmental Quality
Northwest Region
700 NE Multnomah St., Suite #600
Portland, OR 97232-4100

Re: MACT II Excess Emissions and Continuous Monitoring Summary Report

Dear Mr. Davis:

Attached pursuant to Condition 7 of Part 2 of our Title V permit is the Wauna Mill's *Excess Emissions Summary and Monitoring System Summary Report* for the "MACT II" rule, 40 CFR Part 63, Subpart MM, for the time period of July 1 through December 31, 2015. We are submitting only the Summary Report pursuant to 40 CFR 63.10(e)(3)(vii) because:

1. The total duration of all excess emissions from the chemical recovery furnace, smelt dissolving tank, and lime kiln were less than one percent of total operating time for the six-month period; and

2. During the time period, the continuous monitoring systems downtime for the chemical recovery furnace, smelt dissolving tank, and lime kiln were less than five percent of total operating time for the six-month period.

All actions taken during SSM events were consistent with the Mill's SSM plans.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning the information provided in this letter, please do not hesitate to contact Mike Crawford, of my staff, at (503) 405 - 3233.

Sincerely,

Steve R. Francoeur
Vice President / Mill Manager

c: Air Operating Permits
US Environmental Protection Agency
Mail Stop OAQ-084
1200 Sixth Avenue
Seattle, WA 98101

Summary Report –

Gaseous and Opacity Excess Emission and

Continuous Monitoring System Performance

Company Name:	Georgia-Pacific Consumer Products LP
Address:	92326 Taylorville Road Clatskanie, OR 97016
Reporting Period – Begin:	July 1, 2015
Reporting Period – End:	December 31, 2015

Chemical Recovery Furnace (CRF) and Smelt Dissolving Tank (SDT)

Air Pollutant:	Particulate Matter (surrogate for HAP metals)
Emission Limitation:	0.044 grains / dscf @ 8% O_2 (Rec. Furn.) 0.20 lbs / ton of black liquor solids (Smelt Tank)
Monitoring Limitation:	CRF opacity >35% for >6% of the CRF operating time CRF opacity average of ten consecutive 6-minute averages >20% SDT scrubber flow of 140 gpm as a 3 hour block average SDT non-venturi scrubber pressure drop 0.001 inches of water as a 3 hour block average
Brief Process Description:	Chemical recovery furnace and smelt dissolving tank are basically coupled with respect to operations. The spent cooking chemicals or, black liquor, from the kraft digesters contain spent organic and inorganic chemicals. The first step in kraft black liquor recovery is multiple effect evaporation. Using steam as the energy source, water is boiled off to increase the solids content of the liquor. The black liquor is processed further in the concentrators, where steam energy is used to further reduce the water content of the black liquor. At this point, the heavy black liquor is sprayed into the chemical recovery furnace. The liquor droplets dry and partially pyrolyze

before falling onto the char bed. The particulate matter in the flue gas exiting the chemical recovery furnace is controlled by an electrostatic precipitator.

Incomplete combustion in the porous char bed causes carbon and carbon monoxide to act as reducing agents, thus converting sulfate and thiosulfate to sulfide. The heat is sufficient to melt the sodium salts, which filter through the char bed to the floor of the furnace. The "smelt" then flows by gravity through water-cooled spouts to the smelt dissolving tank. The smelt is dissolved in a solution of weak wash and now is called green liquor due to the color of the solution. The particulate matter in the exhaust gas from the smelt dissolving tank is controlled by a scrubber.

Monitor Manufacturer and Model Number:

Chemical Recovery Furnace

Teledyne LightHawk 560 Opacity (Ser: 5600946 [west])
Teledyne LightHawk 560 Opacity (Ser: 5600947 [east])
Last Audit Checks: December 2015

Smelt Dissolving Tank Scrubber

Rosemount Model 8707 Mag Flow Tube
Rosemount Model 8712 transmitter
(fan flow)
Last Audit / Installation Date: May 2001

Rosemount Model 8707 Mag Flow Tube
Rosemount Model 8712 Transmitter
(recirculation flow)
Last Audit / Installation Date: May 2001

Rosemount Model 3051 Pressure Transmitter
(inlet)
Last Audit / Installation Date: May 2001

Rosemount Model 3051 Pressure Transmitter
(outlet)
Last Audit / Installation Date: May 2001

Total Operating Time:

Chemical Recovery Furnace = 255,619 Minutes
(4,260.3 Hours)

Smelt Dissolving Tank = 4,260.3 Hours

Changes in SSM Plan, CMS, processes, controls: No changes in the SSM, CMSs, processes or controls.

Lime Kiln

Air Pollutant:	Particulate Matter (surrogate for HAP metals)
Emission Limitation:	0.064 grains / dscf @ 10% O_2
Monitoring Limitation:	Lime kiln scrubber flow of 500 gpm as a 3 hour block average Lime kiln scrubber pressure drop of 20 inches of water as a 3 hour block average
Brief Process Description:	Lime Kiln The green liquor from the smelt dissolving tank is clarified and subsequently reacted with lime to form white liquor. The white liquor is clarified to remove any lime mud. The lime mud is then pumped to a lime mud filter for dewatering. Then the lime mud is fed into the lime kiln. The purpose of the lime kiln is to convert the lime mud from calcium carbonate to calcium oxide or lime for reuse in the process. The particulate matter in the exhaust gas from the lime kiln is controlled by a venturi scrubber.
Monitor Manufacturer and Model Number:	Foxboro 2806-SABA-TBA-G Mag Flow Tube Foxboro E98 Transmitter Last Audit / Installation Date: May 2005 Rosemount 1151DP4S222D1L 4 Diff. Press. Transmitter Last Audit / Installation Date: May 2005
Total Operating Time:	Lime Kiln = 4,191.0 Hours

Changes in SSM Plan, CMS, processes, controls: No changes in the SSM, CMSs, processes or controls.

GEORGIA-PACIFIC CONSUMER PRODUCTS LP
WAUNA MILL

EXCESS EMISSIONS SUMMARY AND SSM REPORT

2nd Semi-Annual 2015
(July 1, 2015 - December 31, 2015)

CHEMICAL RECOVERY FURNACE ELECTROSTATIC PRECIPITATOR

Excess Emissions / Parameter Monitor Exceedances

Chemical Recovery Furnace - East Excess Emissions

Duration of Excess Emission (6-min avg > 35%) in Reporting Period	
Category	**Minutes**
A. Startup/Shutdown	0
B. Control Equipment Problems	0
C. Process Problems	0
D. Other Known Causes	0
E. Other Unknown Causes	0
Duration of excess emissions (total) [> 35%]	0 Minutes
	0.0 Hours
Source Operating Time	255,619 Minutes
	4,260.3 Hours
Percent Total Excess Emission of Operating Time [Total duration of excess emissions x (100)]/[Total source operating time]	0.000%
Duration of Excess Emissions Less Those Due to SSM Plan Conforming Events (If applied: excluding startup/shutdown, control equipment problems, and process problems)	0 Minutes
	0.0 Hours
Percent Excess Emissions Less Those Due to SSM Plan Conforming Events of Operating Time [If applied: total duration of excess emissions x (100)]/[Total source operating time]	0.000%

Chemical Recovery Furnace - East Continuous Opacity Monitoring System

Duration of Continuous Opacity Monitoring System Downtime in Reporting Period	
Category	**Minutes**
A. Monitoring Equipment Malfunctions	0
B. Non-Monitoring Equipment Malfunctions	0
C. QA / QC Calibrations	60
D. Other Known Causes (mill wide PI computer system)	78
E. Other Unknown Causes	0
Duration of monitor downtime (total)	138 Minutes
	2.3 Hours
Source Operating Time (Recovery Furnace)	255,619 Minutes
	4,260.3 Hours
Percent Total Monitor Downtime of Operating Time [Total duration of excess emissions x (100)]/[Total source operating time]	0.05%
Duration of Monitor Downtime Less Those Due to SSM Plan Conforming Events (If applied: excluding startup/shutdown, control equipment problems, and process problems)	0 Minutes
	0.0 Hours
Percent Monitor Downtime Less Those Due to SSM Plan Conforming Events of Operating Time [If applied: total duration of excess emissions x (100)]/[Total source operating time]	0.00%

GEORGIA-PACIFIC CONSUMER PRODUCTS LP
WAUNA MILL

EXCESS EMISSIONS SUMMARY AND SSM REPORT

2nd Semi-Annual 2015
(July 1, 2015 - December 31, 2015)

CHEMICAL RECOVERY FURNACE ELECTROSTATIC PRECIPITATOR

Excess Emissions / Parameter Monitor Exceedances

Chemical Recovery Furnace - West Excess Emissions

Duration of Excess Emission (6-min avg > 35%) in Reporting Period	
Category	**Minutes**
A. Startup/Shutdown	0
B. Control Equipment Problems	0
C. Process Problems	0
D. Other Known Causes	0
E. Other Unknown Causes	0
Duration of excess emissions (total) [> 35%]	0 Minutes
	0.0 Hours
Source Operating Time	255,619 Minutes
	4,260.3 Hours
Percent Total Excess Emission of Operating Time [Total duration of excess emissions x (100)]/[Total source operating time]	0.000%
Duration of Excess Emissions Less Those Due to SSM Plan Conforming Events (If applied: excluding startup/shutdown, control equipment problems, and process problems)	0 Minutes
	0.0 Hours
Percent Excess Emissions Less Those Due to SSM Plan Conforming Events of Operating Time [If applied: total duration of excess emissions x (100)]/[Total source operating time]	0.000%

Chemical Recovery Furnace - West Continuous Opacity Monitoring System

Duration of Continuous Opacity Monitoring System Downtime in Reporting Period	
Category	**Minutes**
A. Monitoring Equipment Malfunctions	0
B. Non-Monitoring Equipment Malfunctions	0
C. QA / QC Calibrations	54
D. Other Known Causes (mill wide PI computer system)	78
E. Other Unknown Causes	0
Duration of monitor downtime (total)	132 Minutes
	2.2 Hours
Source Operating Time (Recovery Furnace)	255,619 Minutes
	4,260.3 Hours
Percent Total Monitor Downtime of Operating Time [Total duration of excess emissions x (100)]/[Total source operating time]	0.05%
Duration of Monitor Downtime Less Those Due to SSM Plan Conforming Events (If applied: excluding startup/shutdown, control equipment problems, and process problems)	0 Minutes
	0.0 Hours
Percent Monitor Downtime Less Those Due to SSM Plan Conforming Events of Operating Time [If applied: total duration of excess emissions x (100)]/[Total source operating time]	0.00%

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CHEMICAL RECOVERY FURNACE ELECTROSTATIC PRECIPITATOR

Reporting Period July 1 - December 31, 2015

Excess Emissions / Parameter Monitor Exceedances

Number	Source	Date	Time	Duration (min) [6-min avg > 35%]	Number of 10 consecutive 6-min avgs > 20%	Time for the 10 consecutive 6-min avg > 20%	SSM Plan Followed (Y/N)	Nature & Cause	Corrective Action
na	na	na	na	na	na	na	na	na	na

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SMELT DISSOLVING TANK NON-VENTURI SCRUBBER

2nd Semi-Annual 2015

(July 1, 2015 - December 31, 2015)

Excess Emissions / Parameter Monitor Exceedances

Smelt Dissolving Tank Non-Venturi Scrubber - Excess Emissions based on surrogate parameters

Duration of Excess Emission in Reporting Period	
Category	**Hours**
A. Startup/Shutdown	0.0
B. Control Equipment Problems-Malfunction	0.0
C. Process Problems-Malfunction	0.0
D. Other Known Causes	0.0
E. Other Unknown Causes	0.0
Duration of excess emissions	0.0 Hours
Source Operating Time	4,260.3 Hours
Percent Total Excess Emission of Operating Time [Total duration of excess emissions x (100)]/[Total source operating time]	0.00%
Duration of Excess Emissions Less Those Due to SSM Plan Conforming Events (excluding startup/shutdown, control equipment problems, and process problems)	0.0 Hours
Percent Excess Emissions Less Those Due to SSM Plan Conforming Events of Operating Time [Total duration of excess emissions x (100)]/[Total source operating time]	0.00%

Smelt Tank Dissolving Tank Non-Venturi Scrubber - Continuous Pressure Drop Monitoring System

Duration of Continuous Pressure Drop Monitoring System Downtime in Reporting Period	
Category	**Hours**
A. Monitoring Equipment Malfunctions	0.0
B. Non-Monitoring Equipment Malfunctions	0.0
C. QA / QC Calibrations	0.0
D. Other Known Causes (mill wide PI computer system)	2.9
E. Other Unknown Causes	0.0
Duration of monitor downtime (total)	2.9 Hours
Source Operating Time (Lime Kiln)	4,260.3 Hours
Percent Total Monitor Downtime of Operating Time [Total duration of excess emissions x (100)]/[Total source operating time]	0.07%
Duration of Monitor Downtime Less Those Due to SSM Plan Conforming Events (excluding startup/shutdown, control equipment problems, and process problems)	0.0 Hours
Percent Monitor Downtime Less Those Due to SSM Plan Conforming Events of Operating Time [Total duration of excess emissions x (100)]/[Total source operating time]	0.00%

Smelt Dissolving Tank Non-Venturi Scrubber - Continuous Scrubber Flow Rate Monitoring System

Duration of Continuous Scrubber Flow Rate Monitoring System Downtime in Reporting Period	
Category	**Hours**
A. Monitoring Equipment Malfunctions	0.0
B. Non-Monitoring Equipment Malfunctions	0.0
C. QA / QC Calibrations	0.0
D. Other Known Causes (mill wide PI computer system)	2.9
E. Other Unknown Causes	0.0
Duration of monitor downtime (total)	2.9 Hours
Source Operating Time (Lime Kiln)	4,260.3 Hours
Percent Total Monitor Downtime of Operating Time [Total duration of excess emissions x (100)]/[Total source operating time]	0.07%
Duration of Monitor Downtime Less Those Due to SSM Plan Conforming Events (excluding startup/shutdown, control equipment problems, and process problems)	0.0 Hours
Percent Monitor Downtime Less Those Due to SSM Plan Conforming Events of Operating Time [Total duration of excess emissions x (100)]/[Total source operating time]	0.00%

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SMELT DISSOLVING TANK NON-VENTURI SCRUBBER

2nd Semi-Annual 2015

(July 1, 2015 - December 31, 2015)

Excess Emissions / Parameter Monitor Exceedances

Number	Date	Time	Duration (hrs)	Parameter A = Press Drop Z = Flowrate	"unit-exceedeance-day" (Y/N)	SSM Plan Followed (Y/N)	Nature & Cause	Corrective Action
na	na	na	na	na	na	na	na	na

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LIME KILN VENTURI SCRUBBER

2nd Semi-Annual 2015

(July 1, 2015 - December 31, 2015)

Excess Emissions / Parameter Monitor Exceedances

Lime Kiln Scrubber - Excess Emissions based on surrogate parameters

Duration of Excess Emission in Reporting Period	
Category	**Hours**
A. Startup/Shutdown	0.0
B. Control Equipment Problems-Malfunction	0.0
C. Process Problems-Malfunction	0.0
D. Other Known Causes	0.0
E. Other Unknown Causes	0.0
Duration of excess emissions	0.0 Hours
Source Operating Time	4,191.0 Hours
Percent Total Excess Emission of Operating Time [Total duration of excess emissions x (100)]/[Total source operating time]	0.00%
Duration of Excess Emissions Less Those Due to SSM Plan Conforming Events (excluding startup/shutdown, control equipment problems, and process problems)	0.0 Hours
Percent Excess Emissions Less Those Due to SSM Plan Conforming Events of Operating Time [Total duration of excess emissions x (100)]/[Total source operating time]	0.00%

Lime Kiln Scrubber - Continuous Pressure Drop Monitoring System

Duration of Continuous Pressure Drop Monitoring System Downtime in Reporting Period	
Category	**Hours**
A. Monitoring Equipment Malfunctions	0.0
B. Non-Monitoring Equipment Malfunctions	0.0
C. QA / QC Calibrations	0.0
D. Other Known Causes (mill wide PI computer system)	0.0
E. Other Unknown Causes	0.0
Duration of monitor downtime (total)	0.00 Hours
Source Operating Time (Lime Kiln)	4,191.0 Hours
Percent Total Monitor Downtime of Operating Time [Total duration of excess emissions x (100)]/[Total source operating time]	0.00%
Duration of Monitor Downtime Less Those Due to SSM Plan Conforming Events (excluding startup/shutdown, control equipment problems, and process problems)	0.0 Hours
Percent Monitor Downtime Less Those Due to SSM Plan Conforming Events of Operating Time [Total duration of excess emissions x (100)]/[Total source operating time]	0.00%

Lime Kiln Scrubber - Continuous Scrubber Flow Rate Monitoring System

Duration of Continuous Scrubber Flow Rate Monitoring System Downtime in Reporting Period	
Category	**Hours**
A. Monitoring Equipment Malfunctions	0.0
B. Non-Monitoring Equipment Malfunctions	0.0
C. QA / QC Calibrations	0.0
D. Other Known Causes (mill wide PI computer system)	0.0
E. Other Unknown Causes	0.0
Duration of monitor downtime (total)	0.0 Hours
Source Operating Time (Lime Kiln)	4,191.0 Hours
Percent Total Monitor Downtime of Operating Time [Total duration of excess emissions x (100)]/[Total source operating time]	0.00%
Duration of Monitor Downtime Less Those Due to SSM Plan Conforming Events (excluding startup/shutdown, control equipment problems, and process problems)	0.0 Hours
Percent Monitor Downtime Less Those Due to SSM Plan Conforming Events of Operating Time [Total duration of excess emissions x (100)]/[Total source operating time]	0.00%

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LIME KILN VENTURI SCRUBBER

2nd Semi-Annual 2015
(July 1, 2015 - December 31, 2015)

Excess Emissions / Parameter Monitor Exceedances

Number	Date	Time	Duration (hrs)	Parameter A = Press Drop Z = Flowrate	"unit-exceedeance-day" (Y/N)	SSM Plan Followed (Y/N)	Nature & Cause	Corrective Action
na	na	na	na	na	na	na	na	na